

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION

-FILED-
IN OPEN COURT
FEB 12 2025
At _____ M
Chanda J. Berta, Clerk
U.S. DISTRICT COURT
NORTHERN DISTRICT OF INDIANA

UNITED STATES OF AMERICA,)	INDICTMENT
)	(Three Counts)
Plaintiff,)	
)	
v.)	Case No. 3:25-CR-12 CCB
)	
VANCE WHITE,)	18 U.S.C. § 1343 (wire fraud)
)	
Defendant.)	

THE GRAND JURY CHARGES:

**COUNTS 1-3
(Wire Fraud, 18 U.S.C. § 1343)**

1. At all times relevant to this Indictment:
2. Business A operated a chain of retail stores at various locations in the Northern District of Indiana and elsewhere.
3. Business A offered its customers the ability to purchase items in its stores with personal checks.
4. Business A employed Business B to oversee the processing of personal checks. Business B was a check-verification business headquartered in Florida. Business B's check authorization electronic servers were located in Florida.

The Scheme to Defraud

5. From in or about March 2019, through in or about August 2023, in the Northern District of Indiana and elsewhere, the defendant,

VANCE WHITE,

knowingly devised and intended to devise a scheme to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

6. The purpose of the scheme was to obtain money and property from the retail stores of Business A and of other businesses for WHITE's personal use and benefit.

7. As part of the scheme, WHITE stole and attempted to steal merchandise at retail stores belonging to Business A located in the Northern District of Indiana and elsewhere by tendering counterfeit personal checks as payment for merchandise when going through check-out lines. After WHITE tendered the counterfeit personal checks to the cashiers in the check-out lines, the cashiers would electronically transmit the information from the checks to Business B for a check verification process.

8. As part of the scheme, when Business B sent back notices to the cashiers that the checks should be declined, WHITE directed the cashiers to override the check declination by providing the cashiers with an authorization code at the check-out counters. At WHITE's direction, the

cashiers accepted WHITE's counterfeit personal checks as payment, and WHITE exited the stores with merchandise.

9. As part of the scheme, WHITE returned some of the merchandise to other retail stores belonging to Business A. Upon returning the merchandise along with the purchase receipts, WHITE was reimbursed with cash.

10. WHITE was not entitled to the cash reimbursements for returned merchandise, as he had originally stolen the merchandise by means of counterfeit checks.

11. Over the course of the scheme, WHITE stole and attempted to steal merchandise by counterfeit checks at Business A's retail stores in more than a dozen states, including Indiana, Ohio, and Illinois.

12. As part of the scheme, WHITE also stole and attempted to steal merchandise by counterfeit checks at other retail stores not operated by Business A.

13. As a result of the scheme, WHITE obtained and attempted to obtain more than \$250,000 to which he was not entitled.

14. On or about the dates listed below, in the Northern District of Indiana and elsewhere, the defendant,

VANCE WHITE,

for the purpose of executing and attempting to execute the scheme to defraud described above, caused to be transmitted by means of wire communication in

interstate commerce certain writings, signs, signals, and sounds described below for each count, each transmission constituting a separate count:

Count	Date of transmission*	Description of transmission
1	October 21, 2022	An electronic verification request for a personal check bearing account number ***583 in the amount of \$1,016.41, from Business A's store in Mishawaka, Indiana, to Business B's computer server in Florida
2	July 23, 2023	An electronic verification request for a personal check bearing account number ***221 in the amount of \$1,080.51, from Business A's store in Mishawaka, Indiana, to Business B's computer server in Florida
3	July 23, 2023	An electronic verification request for a personal check bearing account number ***375 in the amount of \$1,032.39, from Business A's store in Mishawaka, Indiana, to Business B's computer server in Florida

*All dates are on or about.

All in violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATIONS

15. The allegations contained in Counts 1 through 3 of this Indictment are hereby realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

16. Upon conviction of the offense of wire fraud in violation of Title 18, United States Code, Section 1343, as set forth in Counts 1 through 3 of the Indictment, the defendant, **VANCE WHITE**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses. The property to be forfeited includes, but is not limited to, \$345,866.52 in cash and store merchandise.

17. Upon conviction of the offenses set forth in the Indictment, the government will seek a money judgment in the amount of proceeds received for the defendant's participation in the alleged offenses.

18. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

DATED: February 12, 2025

A TRUE BILL:

s/ Grand Jury Foreperson
Grand Jury Foreperson

APPROVED BY:

TINA L. NOMMAY
ACTING UNITED STATES ATTORNEY

By: s/ Luke N. Reilander
Luke N. Reilander
Assistant United States Attorney